

EXHIBIT F

ANNE SMITHERS, et al,)	
)	
Plaintiffs,)	
)	
vs.)	Civ. Action No. 1:18cv676 (TSE/IDD)
)	
FRONTIER AIRLINES INC.,)	
)	
Defendant.)	
)	

To: Frontier Airlines Inc. (“Frontier”)


Pursuant to relevant law, Frontier has a duty promptly (A) to designate to Plaintiff's counsel one or more representatives to address one, some or all of the following areas of inquiry as a witness, by inquiry number, (B) to prepare the witness in advance of the deposition to make admissions on behalf of the Defendant pursuant to FRCP 30(b)(6), and (C) to identify the areas of inquiry each witness is being produced to address. If Frontier fails to produce a representative responsive to an area of inquiry, it must designate another. See, *Alexander v. FBI*, 186 F.R.D. 148 (1999).

1. Frontier's pilot rules for rest and alcohol consumption prior to flight.
2. The contractual arrangement between Frontier and the ground handling company operating as 'Menzie's,' specifically the relevant agreement in force at Denver Int'l Airport on 12-25-17.
3. The circumstances relating to why Plaintiff Smithers was removed from the aircraft, including decision making, the chain of command, operating procedures and guidelines.
4. The names and circumstances of the individuals who for any reason after boarding did not remain aboard the aircraft from Denver to Washington on 12-25-17.

5. The details of any investigation that was performed after Plaintiff Smithers complained to Frontier of her treatment on 12/25/2017, including any disciplinary action that was taken.
6. The details of all complaints that were received, from any source, concerning Flt 544 from Denver to DCA on December 25, 2017.
7. Any formal or informal reporting requirements, either internal to Frontier or external to a government agency that are either customary or required when a passenger is removed from a flight due to safety concerns. Any reports or communications of any kind that did in fact occur as a result of Plaintiff Smithers being ejected from the aircraft.
8. Any training given by Frontier to the ground handling agents in the process whereby a passenger in similar circumstances to the Plaintiff is removed from an aircraft.
9. Section 50.55 of the Station Administration Manual concerning what to do if a passenger accuses an employee of being intoxicated, whether the Menzies women were trained in this process, and why the process was not followed with Ms. Smithers.

Date & time: Wednesday, April 17, 2019, beginning at 9:30 A.M.
Place: Senn Visciano Canges P.C.
1700 Lincoln Street, Suite 4300
Denver, CO 80203
And at Plaintiffs' option by video connection to
Charlottesville, VA
The Witness and Court Reporter will be in Denver, CO
Court Reporter: TBD

Dated: March 21, 2019
Charlottesville, VA 22902

Signed: 

William T. Woodrow, III
VA. State Bar No. 88122
Stone & Woodrow LLP
Suite 201, Lewis & Clark Plaza
250 West Main Street
Charlottesville, VA 22902
Ph. 855-275-7378
Email: will@stoneandwoodrowlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of March 2019, I sent by e mail and US Mail the preceding Deposition Notice under FRCvP 30(b)(6) to the following individual:

ELAINE CHARLSON BREDEHOFT

Elaine Charlson Bredehoft, VSB No. 23766

Charlson Bredehoft Cohen & Brown, P.C.

11260 Roger Bacon Drive, Suite 201

Reston, VA 20190

(703) 318-6800 Telephone (703) 318-6808 Facsimile

ebredehoft@cbcblaw.com

Counsel for Defendants

Frontier Airlines Inc



William T. Woodrow, III, Esq.

Thatcher A. Stone, Esq.

Stone & Woodrow LLP

250 West Main Street, Suite 201

Lewis & Clark Plaza

Charlottesville, VA 22902

(855) 275-7378 Telephone

(646) 873-7521 Facsimile

will@stoneandwoodrowlaw.co

thatcher@stoneandwoodrowlaw.com

Counsel for Plaintiffs